

## **Sponsored Project Proposals Submitted Outside CALS/UW Channels**

*Approved by CALS APC, November, 2006*

### ***Policy***

Effective immediately, awards generated by actions submitted without College and University approval prior to submission will not be accepted. If you have already submitted any extramural support applications without College and University approval, please route them with a campus transmittal form to CALS Research Division as soon as possible but no later than January 31, 2007. After that date, we will no longer accept awards for applications that have not been routed and approved by the College and University prior to submission.

### ***Background***

Since August, 2006, we have identified at least 23 proposals that were submitted to research sponsors by CALS PIs directly to the sponsor and therefore not routed through the CALS (College) and the University of Wisconsin-Madison (University). This is an extraordinarily large number of proposals that define a significant liability for PIs, their departments, the College, and the University.

The Board of Regents of the University of Wisconsin System has designated signature authority to Research and Sponsored Programs for proposals, agreements, contracts, etc. related to extramural support activities of faculty/staff of the University. This authority originates in Chapter 36 of the Wisconsin Statutes and is proceduralized in Regent Resolutions 8074 and UW System General Administrative Policy Paper (GAPP 2). As such, the University requires all proposals to be routed and approved by the College and University prior to being submitted to any sponsor or funding agency for the following reason: When a PI submits an application for funding to a sponsor or agency without institutional approval, they do so outside of the scope of their employment. Use of university facilities or staff is not authorized for this work; however a submission that originates at UW implies to the sponsor or funding agency that institutional approval has been granted.

Misrepresentation of this type may expose the individual to personal accountability for the commitments made in the document and to liability associated with execution of the project. Such misrepresentation often invalidates the application. This can be a particularly difficult situation for research agreements, where sponsors intend to hold a person to the terms and conditions proposed within the application that are unacceptable to the institution. In fact it is common that budgets, terms, and conditions in proposals submitted without campus approval may not be accepted under state, federal, or campus rules/regulations.

The university mandate requires all extramural support proposals, agreements, contracts, etc. to be submitted for College and University review and approval, along with a transmittal form signed by the department chair/center director or his/her designate prior to submission. This applies to the following types of communications with sponsors or collaborators:

- letters of intent and preproposals
- agreements
- contracts
- full proposals
- proposal revisions, renewals, continuations, supplements
- subcontracting proposals, and other extramural support actions